

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DIVISION  
Norfolk Division**

ANTONIO FERNANDEZ,

Plaintiff,

Civil Action No.: 2:25-cv-53

v.

ANNA ANIMAH RICHARD,

Defendant.

**PLAINTIFF’S MOTION EXTEND TIME TO COMPLETE DISCOVERY**

Plaintiff Antonio Fernandez seeks a short extension of time in which to complete discovery in this matter for the sole purpose of completing errata sheets in connection with recently taken depositions.

On July 9, 2025, counsel for the Defendant took the deposition of Plaintiff Antonio Fernandez. On July 21, the transcript from that deposition was delivered by the court reporter. Federal Rule of Civil Procedure 30(e)(1) allows a deponent thirty (30) days in which to review the transcript and complete an errata sheet (if necessary). However, Plaintiff’s deadline for discovery to be completed by is currently Tuesday, July 29, 2025. ECF 17, at 1. Plaintiff therefore seeks a short six (6) day extension of his discovery deadline, until August 1, 2025, solely for the purpose of completing the review of his deposition transcript and, if necessary, completing an errata sheet. Counsel for the Defendant have consented to such an extension.

Plaintiff respectfully moves this Court to extend his deadline by which to complete discovery from Tuesday, July 29, 2025, to Monday, August 4, 2025, for the sole purpose of reviewing his deposition transcript and, if necessary, completing an errata sheet.

Respectfully submitted,

ANTONIO FERNANDEZ

By: /s/ Danny Zemel  
Counsel

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*Counsel for Plaintiff Antonio Fernandez*

**Certificate of Service**

I hereby certify that on this 28<sup>th</sup> day of July 2025, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send notification of such filing to all counsel of record.

By: /s/ Danny Zemel  
Counsel